

RNIB's response to Ofcom's consultation on Listed Events – Commonwealth Games 2018

1. About us

As the largest organisation of blind and partially sighted people in the UK, RNIB is pleased to have the opportunity to respond to this consultation. We are a membership organisation with over 10,000 members who are blind, partially sighted or the friends and family of people with sight loss. 80 per cent of our Trustees and Assembly Members are blind or partially sighted. We encourage members to be involved in our work and regularly consult with them on government policy and their ideas for change. As a campaigning organisation of blind and partially sighted people, we fight for the rights of people with sight loss in each of the UK's countries. Our priorities are to:

- Stop people losing their sight unnecessarily
- Support independent living for blind and partially sighted people
- Create a society that is inclusive of blind and partially sighted people's interests and needs.

We also provide expert knowledge to business and the public sector through consultancy on improving the accessibility of the built environment, technology, products and services.

2. Importance of TV to blind and partially sighted users

Since our Needs Survey in 1991 showed that a large majority of blind and partially sighted people watch television¹, RNIB has taken an active role in highlighting TV access issues. It has worked to try to ensure access to programmes, services and equipment, both by direct work with

¹ RNIB Needs Survey (1991) Blind and partially sighted adults in Britain: the RNIB Survey Volume 1, by Ian Bruce, Aubrey McKennell and Errol Walker

broadcasters and manufacturers and by influencing legislation and regulation.

In this digital age, being able to watch TV remains important to blind and partially sighted people. In 2006 Research by the University of Birmingham² found that around 87 per cent of blind and partially sighted people regularly watch TV and videos or DVDs. The media plays an important role in the lives of blind and partially sighted people by providing access to news, information and entertainment.

Research conducted by Access Economics in 2009 found that one in five people aged 75 or over were living with sight loss and this rose to one in two people aged 90 or over³. The research also suggested that by 2050 the number of people with sight loss in the UK would double to nearly four million.

In RNIB's "Update on the inclusive society 2013" report respondents were asked to select from a list of statements about what kind of impact fully accessible television and radio would have on their lives:

- 56% said that it would make them more independent;
- 56% said it would make them happier about life;
- 56% said it would make them feel less socially isolated;
- 51% said it would make them feel better about their sight loss

In addition 68% of respondents selected at least one of these impact statements and 38% selected all four of them.

3. Response

Section 1.12 of Ofcom's Code on Sports and Other Listed and Designated Events states "Section 104 of the Act requires Ofcom to specify the circumstances in which the coverage of listed events generally, or of a particular listed event, is, or is not, to be treated as live. In considering, this matter Ofcom takes the view that the interests of viewers lie in allowing them to participate in the event as it happens, as far as possible."

² Douglas, G., Corcoran, C., Pavey, S. (August 2006) Network 1000: Opinions and circumstances of visually impaired people in Britain: report based on over 1000 interviews.

³Access Economics, July 2009, Future Sight loss UK (1): The economic impact of partial sight and blindness in the UK adult population

For many blind and partially sighted viewers the ability to participate in sporting events requires providing enhanced commentary (sometimes known as Live Audio Description) such as

- Channel 4 did for the opening and closing ceremonies and, a selection of games in the London Paralympics in 2012, Sochi Winter Paralympics in 2014 and Rio Paralympics in 2016
- NBC did for the 2016 Olympics in Rio and again for the 2018 Pyeongchang Winter Olympics
- AMI did for the Wedding of Prince William and Kate Middleton in 2011 and the whole of the 2012 Summer Paralympics and the 2014 winter Paralympics
- the BBC did in 2012 for the Opening and closing ceremonies of the Olympic games and for selected sports

3.1 Feedback from end users on the need for accessibility

Enhanced commentary of major events is of huge benefit to people who use it as comments on Twitter and other social media show.

“@C4Paralympics I'm blind, and loving the #AudioDescription! My VI daughter is also loving the ceremony! :)” - Paula @JaffaStar 29 Aug 2012

“My #audiodescription of the #Olympics is totally working! This is a game changer! Thank you @comcastcares!” - Tif @rebornspirit 8 Aug 2016

It is also missed when it's not there:

“no live audio description for the winter olympic opening and closing ceremonies bbc? #bbcfail #bbcsochi” - big pawed bear @BigPawedBear 23 Feb 2014

As a Public Service Broadcaster the BBC is subject to the Public Sector Equality Duty which places an obligation to “advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it”. However, since 2012 they have failed to provide enhanced commentary when broadcasting the Olympics. Being granted an exclusive license for broadcasting any event in the UK must include taking responsibility for ensuring that as many people in the UK as possible can participate. This means any agreement to allow the BBC exclusive broadcast rights for the Commonwealth Games in the UK must include an obligation to provide enhanced commentary for blind and partially sighted people.

Often audio description or enhanced commentary in this case is perceived as an auxiliary service however a mature model of accessibility requires it to be equal to other production costs such as PR, Marketing etc.

This is about inclusive society and ensuring that people with disabilities are fully able to participate in society.

The very symbol of the Commonwealth Games, it's logo, represents the need for inclusivity. As the Commonwealth Games Federation state on their website:

“The three converging points supporting the horizontal black bar represent the 'Trinity of Values' that symbolise the Games; unifying Humanity (red), giving all athletes a chance to realise their destiny (yellow) and promoting equality (blue).“

For this reason the ability to watch the games for everyone, including blind and partially sighted people, should be protected.